

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, <i>et al</i> ,	§	
	§	
Plaintiffs,	§	
VS.	§	CIVIL ACTION NO. 2:13-CV-00193
	§	
RICK PERRY, <i>et al</i> ,	§	
	§	
Defendants.	§	

**STIPULATION OF FACTS REGARDING
PLAINTIFF-INTERVENOR IMANI CLARK**

Plaintiff-Intervenor Imani Clark and Defendants stipulate to the following undisputed facts:

1. Ms. Clark has an original or certified copy of her birth certificate in her possession, custody, or control.
2. Ms. Clark does not currently have, in her possession, custody, or control,¹ a form of identification acceptable for voting under Texas Election Code 63.0101 (including (a) an unexpired Texas Driver's License (or an expired Texas Driver's License which has expired in the past 60 days); (b) an unexpired Texas Personal Identification Card (or an expired Texas Personal Identification Card which has expired in the past 60 days); (c) an unexpired United States Military Identification Card (or an expired United States Military Identification Card which has expired within the past 60 days); (d) a United States citizenship certificate issued to the person that contains the person's photograph; (e) an unexpired United States passport (or an expired United States passport which has expired in the past 60 days); (f) an unexpired Texas license to carry a concealed handgun (or an expired Texas license to carry a concealed handgun which has expired in the past 60 days) ("SB 14 ID").

¹ Where "possession, custody, or control" is used herein, it is as referred to in Rule 34(a)(1) of the Federal Rules of Civil Procedure.

3. Ms. Clark has, in her possession, custody, or control, the below-checked documents.

☐ Expired Texas driver license that is within two years of expiration date;

Please indicate date of expiration: _____

☐ Expired Texas personal identification card that is within two years of expiration date;

Please indicate date of expiration: _____

☐ United States citizenship (naturalization) certificate with identifiable photo;

☐ unexpired document issued by the United States Citizenship and Immigration Services or successor federal immigration agency, which contains verifiable data and an identifiable photo;

☐ foreign passport with a visa issued by the United States Department of State (valid or expired) with unexpired I-94 marked valid for a fixed duration (unless the applicant was not required by federal law to obtain a visa to enter the United States, in which case just the foreign passport);

☐ foreign passport with a visa issued by the United States Department of State (valid or expired) with an I-94 marked valid for the duration of stay accompanied by appropriate documentation (unless the applicant was not required by federal law to obtain a visa to enter the United States, in which case just the foreign passport).

☐ Original or certified copy of court order with name and date of birth indicating an official change of name and/or gender;

☐ Original or certified copy of United States Department of State Certification of Birth (issued to United States citizens born abroad);

☐ United States citizenship or naturalization papers without identifiable photo

☐ Voter registration card with a disability exemption

☒ Voter registration card without a disability exemption

☒ School records

☐ Insurance policy (at least two years old)

☐ Texas vehicle title and/or registration

☐ Texas boat title and/or registration

☐ Military records

☐ Unexpired military dependent identification card

☐ Original or certified copy of marriage license

- ☐ Original or certified copy of divorce decree
- ☒ Social Security card
- ☐ Pilot's license
- ☒ Unexpired photo driver license or photo identification issued by another U.S. state, U.S. territory, or the District of Columbia
- ☐ Expired photo driver license or photo identification issued by another U.S. state, U.S. territory, or the District of Columbia
- Please indicate date of expiration: _____
- ☐ Offender identification card, Texas Inmate ID card, or similar form of identification issued by Texas Department of Criminal Justice
- ☒ United States Federal Income Tax Form W-2 or Form 1099
- ☐ Numident record from the Social Security Administration
- ☐ Expired Texas driver license
- Please indicate date of expiration: _____
- ☐ Expired Texas personal identification card
- Please indicate date of expiration: _____
- ☐ Professional license issued by Texas state agency
- ☐ Identification card issued by government agency
- ☐ Parole or mandatory release certificate issued by Texas Department of Criminal Justice
- ☐ Federal inmate identification card
- ☐ Federal parole or release certificate
- ☐ Medicare or Medicaid card
- ☐ Selective Service card
- ☒ Immunization records
- ☐ Tribal membership card from federally recognized tribe
- ☐ Certificate of Degree of Indian Blood
- ☐ Veteran's Administration card
- ☐ Hospital issued birth record
- ☐ Current Deed, mortgage, monthly mortgage statement, mortgage payment booklet, or residential lease agreement;
- ☐ Utilities bill or statement (including electric, water, natural gas, satellite television, cable television, or non-cellular telephone statement) dated within 90 days of the date of this Stipulation;
- ☐ Current Homeowners or renters insurance policy or statement;
- ☐ Current Automobile insurance policy or statement;

- ☒ X Checking, savings, investment account, or credit card statement dated within 90 days of the date of this Stipulation;
- ☐ Mail you have received from a federal, state, county, or city government agency dated within 90 days of the date of this Stipulation;
- ☐ Current automobile payment booklet maintained by you or for you;
- ☐ Pre-printed paycheck or pay stub dated within 90 days of the date of this Stipulation;
- ☒ X Medical or health insurance card;
- ☐ Expired concealed handgun license from a U.S. state, a U.S. territory, the District of Columbia or a Canadian province
Please indicate date of expiration:_____
- ☐ Current documents issued by the U.S. Military indicating residential address
- ☐ Texas Department of Criminal Justice document indicating applicant's recent release or parole;
- ☐ Current Form DS2019, I-20, or a document issued by the United States Citizenship and Immigration Services.

Ms. Clark represents that if she acquires an SB 14 ID between now and the conclusion of trial in this matter, that Plaintiff will produce a copy of such SB 14 ID to Defendants.

Dated: September 1, 2014

Respectfully submitted,

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*Counsel for Plaintiff-Intervenors Texas
League of Young Voters Education Fund et
al.*

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2014, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

John B. Scott
JOHN B. SCOTT